

## **REMARKS**

Reconsideration of the present application, as amended, is respectfully requested. Claims 1-24 remain in the application. No have been amended. No claims have been cancelled. Applicants respectfully request reconsideration of the present application.

Examiner rejected claims 1-2, 4-7 under 35 U.S.C. §102(e) as being unpatentable over U.S. Patent No. 6,208,839 to Davani. Davani describes a pager system that includes a default bookmark database 111 where default system bookmarks are stored, and a personalized bookmark database 113 where personalized bookmarks are stored. It is these components that allow a user to easily access Internet and intranet resources. (Davani, column 2, lines 48-53). Davani allows a user to set up personalized bookmarks. Then, Davani:

Alternatively, the paging terminal 112 is coupled with a paging receiver 115 that operates to receive reverse channel signaling information (e.g., acknowledge back pages) from a two-way capable selective call receiver. The acknowledge back response conveys information such as whether a particular message was correctly received (i.e., without errors) or possibly, a response either generated ad hoc or from a predetermined list of "canned" responses. In response to a content of the reverse channel signaling information, the paging terminal 122 will search the default bookmark database 111 or the personalized bookmark database 113, and based on matching a token returned in the reverse channel message, the paging terminal 112, using the processor 109 in conjunction with the network connection device 123 accesses a host computer 106 to retrieve information content representing information corresponding with a uniform resource locator (url). The information content may then be broadcast as a return selective call message to the requesting messaging device in either its raw form (e.g., the actual information content of the document or object pointed to by the url), or as formatted by the paging terminal 112 for proper display by the personal messaging device.

(Column 3, lines 8-29). Thus, the "canned messages" of Davani are sent by the pager, to request information or acknowledge receipt of data. The other "canned message" is the display of the URL and any image associated with the URL (Figures 7 and 8 of Davani). However, these are canned unchanging messages, and therefore cannot be considered equivalent to code in random data received in response to a request. As quoted above, Davani sends the actual information content of the document, formatted or raw, to the pager. With respect to reducing air time, Davani suggests deleting images or other similar data (Davani, column 6, lines 37-45) rather than substituting a code for such data, and having the data on the device, thereby reducing air-time. Thus, Davani clearly teaches away from the present invention.

Claim 1, on the other hand, recites:

A method of using a storage module in a device comprising:  
receiving data in response to a request sent by the device;  
identifying an automatically substituted code in the data;  
replacing the code in the data with corresponding terms in  
the storage module, prior to displaying the data.

(Claim 1). The Examiner asserts that the canned message is replaced with the corresponding terms in the storage module. However, the referenced portion of Davani specifically states that it is the server that receives the canned message, rather than the device. (references to processor 208 and RAM 220 indicate this). Furthermore, the Examiner asserts that the personal messaging device formats the retrieved information, and that this is equivalent to substituting code with corresponding items. However, the portion referenced by the Examiner does not teach or suggest replacing codes with corresponding terms in a storage module. Rather, it notes that the information can be reformatted. Reformatting is not equivalent in any way to "replacing the code with corresponding items in the storage module." Davani does not teach or suggest any

substitution done by the device. Therefore, claim 1, and claims 2-9 which depend on it, are not anticipated by or obvious over Davani. The additional references brought in by the Examiner, Pinter and Schroeder, do not overcome the deficiencies of Davani. Therefore, claims 1-10 are not anticipated by or obvious over the references alone or in combination.

The Examiner further rejected claims 10, 14-17 and 22 under 35 USC 103(a) as being unpatentable over U.S. Patent No. 5,673,322 to Pepe (Pepe) in view of Pinter. Pepe discusses a method of providing data over a low bandwidth connection. However, as the Examiner notes, Pepe does not teach or suggest a database having a plurality of codes and associated terms and a substitution logic.

Pinter describes a paging system, in which the user can select from a list of "canned messages," which are selected by a code. Thus, for example, a short ASCII code may be used to transmit the message "I am on my way home." In order to send this message, the user initiating the message must know which "canned messages" are available, and must select the appropriate code to include the selected canned message. Pinter does not teach or suggest the automatic substitution of codes, to replace text, images, etc. Furthermore, Pinter does not send data to a device in response to a request by the device. Rather, Pinter has a pager or similar device, to which a message is sent by a second party.

Claim 10 recites:

A service provider for providing data to a device via a low bandwidth connection, the service provider comprising:  
a database including a plurality of codes and associated terms;  
a formatting logic to retrieve the data in response to a request from the device;

a substitution logic to automatically replace a term in the data with a code; and  
a transmission logic to transmit the data including the code to the device.

(Claim 10). Pinter does not teach or suggest a substitution logic to automatically replace a term in the data with a code. Rather, Pinter receives a code from a first user, to transmit to a second user. Furthermore, Pinter does not do any automatic substitution to replace a term with a code. Rather, Pinter receives the code directly from the first user, for transmission to the second user. Therefore, claim 10, and claims 11-14 which depend on it, are not obvious over Pepe in view of Pinter.

Claim 15 recites:

A portable device comprising:  
a low bandwidth connection to a network to receive formatted Web content in response to a request;  
a storage module including a plurality of codes and associated data;  
a substitution logic for detecting the codes in the formatted Web content and substituting the associated data for each of the codes;  
such that the bandwidth of data transferred over the low bandwidth connection is reduced by transmitting the codes instead of the associated data.

(Claim 15). As noted above, Pinter does not teach or suggest a substitution logic to automatically replace a term in the data with a code. Therefore, claim 15, and claims 16-21 which depend on it, are not anticipated by or obvious over Pinter.

Claim 22, as amended, recites:

A system comprising:  
a first device having a low bandwidth connection to a network, the first device including a storage module;  
a second device for preparing data for display on the first device;  
the second device including a copy of data on the storage module, the second device automatically replacing a data element

sent to the first device with a code, if the data element is in the storage module;  
whereby the bandwidth used for transmitting the data to the first device is reduced.

(Claim 22, as amended). As noted above, Pinter does not teach or suggest automatically replacing data elements with codes, if the data elements are present in the storage module. Rather, Pinter requires that a human select the codes to be sent. Therefore, claim 22 is not anticipated by or obvious over Pinter.

Examiner further used Schroeder, and Kovanen to reject some dependent claims. Kovanen discusses a radio telephone, in which a removable memory stores the radio subscriber data and system-specific control parameters of the system. Kovanen does not teach or suggest a system that requests data, and substitutes codes. Kovanen does not remedy the shortcomings of Davani, Pinter, and Pepe. Kovanen does not teach or suggest the automatic substitution of codes for data elements. Schroeder discusses an improved user interface for a cellular phone, including predictive capabilities, to speed up data input by using word completion. However, Schroeder does not cure the shortcomings of Davani, Pinter, and Pepe. Schroeder does not teach or suggest the automatic substitution of codes to replace data elements. Therefore, the claims are not obvious over the combination of the above references.


Applicant respectfully submits that in view of the amendments and discussion set forth herein, the applicable rejections have been overcome. Accordingly, the present and amended claims should be found to be in condition for allowance.

If a telephone interview would expedite the prosecution of this application, the Examiner is invited to contact Judith Szepesi at (408) 720-8300.

If there are any additional charges/credits, please charge/credit our deposit  
account no. 02-2666.

Respectfully submitted,  
BLAKELY, SOKOLOFF, TAYLOR & ZAFMAN LLP

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